

**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

|  |   |                                     |
|--|---|-------------------------------------|
| IN RE:                                   | ) | CHAPTER 7                           |
|  | ) |                                     |
| ERIN ENERGY CORPORATION, <i>et al.</i> , | ) | Case No. 18-32106                   |
|  | ) |                                     |
| Debtors.                                 | ) | (Jointly Administered) <sup>1</sup> |
|  | ) |                                     |

**NOTICE OF CORRECTION TO TRUSTEE’S MOTION TO AUTHORIZE PAYMENTS  
ON ACCOUNT OF DIP OBLIGATIONS, ALLOWED ADMINISTRATIVE EXPENSES,  
AND THE ADEQUATE PROTECTION CLAIM ASSERTED BY PUBLIC  
INVESTMENT CORPORATION SOC. LTD.**

PLEASE TAKE NOTICE that on November 10, 2023, the Trustee filed the *Trustee’s Motion to Authorize Payments on Account of DIP Obligations, Allowed Administrative Expenses, and the Adequate Protection Claim Asserted by Public Investment Corporation Soc. Ltd.* [ECF No. 656] (the “Payment Motion”).

PLEASE TAKE FURTHER NOTICE that paragraph 7 of Payment Motion incorrectly indicated the amount of the Chapter 7 Administrative Expense of Kasowitz Benson Torres LLP (“KBT”) previously allowed.

PLEASE TAKE FURTHER NOTICE that KBT’s Chapter 7 Administrative Expense previously finally allowed by order of the Court [ECF No. 630] is \$806,917.82.<sup>2</sup>

PLEASE TAKE FURTHER NOTICE that a corrected chart contained in paragraph 27 of the Payment Motion is as follows, with the corrections indicated in ***bold-italic*** font:

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<sup>1</sup> The jointly administered cases are Erin Energy Corporation (Case No. 18-32106), Erin Energy Ltd. (Case No. 18-32107), and Erin Petroleum Nigeria Limited (Case No. 18-32108). At the commencement of the chapter 7 cases, the case of Erin Energy Kenya Limited (Case No. 18-32108) was also jointly administered with the other Erin debtors by the Trustee. The Erin Energy Kenya Limited case was closed on December 17, 2021.

<sup>2</sup> The “Total Award” in the order finally allowing KBT’s compensation and reimbursement of expenses refers to the iterative compensation and reimbursement finally allowed for the period from November 1, 2018, through and including October 24, 2019. In addition to that amount, the \$349,789.04 previously allowed on an interim basis was allowed on a final basis.

| <i>Dkt.</i> | <i>Claimant</i>   | <i>Amount</i>         |
|-------------|---|-----------------------|
| 524         | Moyes & Co. (Special Financial Advisor to the Trustee)      | \$62,310.00           |
| 525         | Stout Risius Ross, LLC (Financial Advisor to the Trustee)   | \$91,795.75           |
| 527         | Diamond McCarthy LLP (Former Attorney to the Trustee)       | \$244,734.10          |
| 630         | Kasowitz Benson Torres LLP (Former Attorney to the Trustee) | <b>\$806,917.82</b>   |
| 651         | William G. West, P.C. (Accountant to the Trustee)           | \$44,679.50           |
|             | TOTAL:  | <b>\$1,250,437.17</b> |

Dated: November 20, 2023.

Respectfully submitted,

**SHANNON & LEE LLP**

/s/R. J. Shannon

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*General Bankruptcy Counsel to Ronald J.  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served (a) at the time of filing, by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas on all parties registered to receive such service and (b) within one business day of the filing, on the parties on the attached service list by U.S.P.S. first class mail.

/s/R. J. Shannon

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